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QUESTIONS FOR ALL PROSPECTIVE JURORS AS A GROUP

1. The Plaintiff in this case is Walter Elam.

Is anyone acquainted with the Plaintiff?

YES _____ NO _____

2. The Defendants in this case are:

Concourse Village, Inc., Anthony James and Letitia Bowry.

Is anyone acquainted with Anthony James?
Please indicate "YES" or "NO."

YES _____ NO _____

Is anyone acquainted with Letitia Bowry?
Please indicate "YES" or "NO."

YES _____ NO _____

Is anyone acquainted with a member of the Board of Directors of Concourse Village, Inc.?

YES _____ NO _____

3. Does anyone have any friends or relatives who are acquainted with the Plaintiff?

YES _____ NO _____

4. Does anyone have any kind of commercial relationship or interest in Concourse Village, Inc.?

YES _____ NO _____

5. Have you or any friends or relatives ever lived or been a shareholder at Concourse Village, Inc.?

YES _____ NO _____

6. Have you or any friends or relatives worked for Concourse Village, Inc.?

YES _____ NO _____

7. Have you or any friends or relatives worked for Winn Companies, WinnResidential or Winn WB Management Company LLC?

YES _____ NO _____

8. Have you or any friends or relatives lived in any building managed by Winn Companies, WinnResidential or Winn WB Management Company LLC?

YES _____ NO _____

IF YES:

a. Where?

b. For how long?

9. Have you or any friends or relatives ever worked at a residential or commercial property or building?

YES _____ NO _____

If YES:

a. Where?

b. In what capacity?

10. The Plaintiff is represented by the law firm of The Harman Firm, LLP and trial counsel is Walker G. Harman, Jr. and Edgar Rivera. Their offices are located in Manhattan. Has anyone heard of counsel for the Plaintiff?

YES _____ NO _____

11. The Defendants are represented by the law firm of Clifton Budd & DeMaria, LLP. Trial counsel are Robert Sparer, Stefanie Munsky and Carla Gunther. The firm is located in Manhattan. Has anyone heard of counsel for the Defendants?

YES _____ NO _____

12. Does anyone know any of the following people who may testify in this matter?

Please indicate "YES" or "NO" on the line next to each name.

Monica Elam	_____
Sherill Henry	_____
Christina Verney	_____
Leroy Meyers	_____
Constance Walker	_____
Hendricks	_____
Maurice Wright	_____
Calvin Reed	_____
Gerald Turner	_____
Lillian Somersle	_____

13. Have any of you read about this case or heard of it in any way?

YES _____ NO _____

14. Does anyone of their own knowledge have any information about this case?

YES _____ NO _____

15. This case will last for APPROXIMATELY three (3) to five (5) days. Does this time period present any serious problems for anyone?

YES _____ NO _____

16. Have you or any members of your immediate family ever had a claim for damages against anyone?

YES _____ NO _____

If you answered "NO", please go on to Question 17.

If you answered "YES", please complete the following:

What type of claim?

Did it go to court?

Did it go to trial?

Was it decided in court or settled?

Did you feel you or your
family member were treated
fairly?

Would that fact in any way
influence you in reaching a
decision in this case?

17. Do you know of any reason why it might be embarrassing to sit as a juror on this case?

YES _____ NO _____

18. Do you have any physical problem that would make it difficult for you to sit as a juror on this case?

YES _____ NO _____

19. If you are selected as a juror in this case, you will be required to decide solely on the evidence introduced at trial and the instructions that the judge will give you concerning the law, *whether you agree with the law or not*. Is there any reason why you could not do that?

YES _____ NO _____

20. If you were one of the parties to this case, is there any reason why you would not be content to have the case tried by someone in your frame of mind?

YES _____ NO _____

21. Do you know of any reason why you think that you could not render an impartial verdict in this case?

YES _____ NO _____

22. Do you or an immediate family member suffer from a disability?

YES _____ NO _____

23. Are you currently employed?

YES _____ NO _____

If YES:

- a. How long have you been with the employer?

- b. What is your present position?
- c. What are your responsibilities?

24. Have you ever supervised, managed or evaluated the work of any other employee(s)?

YES _____ NO _____

If YES,

- a. How many employees?
- b. What was the nature of your supervision, management, or evaluation?

25. Have you or any friend or family member ever been involved in an employment discrimination or retaliation lawsuit?

YES _____ NO _____

If YES,

- a. What happened?
- b. Do you remember who won?
- c. If the plaintiff won, do you remember what the monetary award was?
- d. Do you think it was fair?

26. Have you or any friend or family member ever been discriminated or retaliated against at work?

YES _____ NO _____

If YES,

- a. What were the circumstances surrounding the discrimination or retaliation?
- b. What, if any, action was taken in response to the discrimination or retaliation and what was the outcome of any response to the discrimination?

27. Have you or any friend or family member ever initiated a complaint alleging discrimination or retaliation against an employer or co-worker?

YES _____ NO _____

If YES,

- a. What were the circumstances surrounding the event?
- b. What was the result of the complaint?

28. Have you or anyone you know ever initiated a lawsuit or filed an administrative complaint alleging discrimination or retaliation?

YES _____ NO _____

If YES,

- a. What were the circumstances surrounding the event?
- b. What was the result of the action or proceeding?

29. Have you or anyone you know ever been named as the defendant or respondent in a lawsuit or administrative proceeding alleging discrimination or retaliation?

YES _____ NO _____

If YES,

- a. What were the circumstances surrounding the event?
- b. What was the result of the action or proceeding?

30. Apart from discrimination, have you or any member of your family been the plaintiff or defendant in a lawsuit?

YES _____ NO _____

If YES,

- a. What kind of case was it?
- b. Were you the plaintiff or the defendant?

c. What was the outcome of the lawsuit?

31. Have you ever testified in a legal proceeding?

YES _____ NO _____

If YES,

a. When?

b. What were the circumstances?

32. Are you or anyone you know employed by or in any manner involved with either the legal profession or the administration of justice? If yes, Please explain.

33. Do you believe that your employer treats you fairly?

YES _____ NO _____

34. As a general matter, do you believe that employers ordinarily treat employees fairly?

YES _____ NO _____

35. Do you believe that merely because an employer is a party, or that an employee is a party, that it will make a difference in your determination?

YES _____ NO _____

36. Have you or anyone you know ever taken, requested to take, or otherwise tried to take leave from work pursuant to the Family and Medical Leave Act?

YES _____ NO _____

If YES,

a. What were the circumstances surrounding the event?

b. What was the result of the request?

37. Have you or anyone you know ever taken, requested to take, or otherwise tried to take leave from work to care for a family member?

YES _____ NO _____

If YES,

- a. What were the circumstances surrounding the event?
- b. What was the result of the request?

38. Have you or anyone you know ever cared for or were associated with an individual with a disability?

YES _____ NO _____

If YES,

- a. What degree of care did the individual require?
- b. What were the circumstances surrounding the event?

INDIVIDUAL QUESTIONS FOR THE JURORS

1. How long have you lived in New York?
(If less than three years, inquire about previous residence)
2. Are you married? Is your spouse employed, and if so, how? Do you have any children?
How old? Are any employed? What do they do?
3. What is the extent of your formal education?
4. Are you a member of any organizations?
5. Do you have any prior jury service? Was it a criminal or a civil case?
(If a criminal case:)

Do you understand that although the government in a criminal case is required to prove the defendant's guilt "beyond a reasonable doubt," a plaintiff in a civil case must prove his case by a "preponderance of the evidence?"

6. Were you ever a witness in a case? Civil or criminal?
7. Do you believe that you can sit fairly and impartially in this case?